No. 18-MJ-5009-JGD

AFFIDAVIT OF POSTAL INSPECTOR DANIELLE SCHRAGE IN SUPPORT OF <u>AN APPLICATION FOR A CRIMINAL COMPLAINT</u>

I, Danielle Schrage, state:

Introduction and Agent Background

- 1. I have been employed as a Postal Inspector with the United States Postal Inspection Service since February 2007. During my employment as a Postal Inspector, I have received training in conducting investigations involving crimes that adversely affect, or fraudulently use, the United States Mail and Postal Service. I have conducted or participated in criminal investigations into various financial crimes that violate Title 18 of the United States Code, including mail fraud, bank fraud, wire fraud, identity theft, money laundering, and credit card fraud.
- 2. In the course of my employment and in conducting or participating in these investigations, I have received training and have used investigative techniques such as interviewing witnesses, conducting physical surveillance; analyzing telephone data; and analyzing records including bank records.

Purpose of the Affidavit

- 3. I am submitting this affidavit in support of an application for a criminal complaint charging Ashley Barrett ("BARRETT") with two counts of mail fraud, in violation of 18 U.S.C. § 1341.
- 4. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for issuance of

the requested complaint and does not set forth all of my knowledge about this matter.

Probable Cause to Believe that BARRETT Committed Mail Fraud

- 5. Victim W.W. is a 72-year old man who lives in Iowa. According to W.W., several years ago he received a telephone call from someone purporting to be a lottery representative named "Mr. Washington." "Mr. Washington" told W.W. that W.W. had won \$11 million through the Mega Millions lottery, but W.W. needed to pay taxes on the winnings before the winnings could be released. "Mr. Washington" told W.W. to pay the taxes via prepaid debit cards called Green Dot cards. W.W. bought Green Dot cards and read the card numbers to "Mr. Washington" over the phone to pay his "taxes." W.W. received only two checks from "Mr. Washington," one for \$4,000 and one for \$8,000. Neither check cleared. W.W. stopped taking calls from "Mr. Washington."
- 6. Later, in or about 2015, W.W. received a telephone call from a person purporting to be an FBI agent named David Schneider. "Agent Schneider" told W.W. that he could help W.W. get his money back. "Agent Schneider" instructed W.W. to send BARRETT money. Thereafter, although W.W. did not know BARRETT, he mailed BARRETT checks, as set forth below.
- 7. "Agent Schneider" called W.W. from (508) 470-8768. That number is registered to Ymax Communications Corp.
- 8. According to Ymax records, from February 2013 through at least 2015, the subscriber name and address associated with (508) 470-8768 was N.B.¹, 43 Ridgewood Avenue,

¹ This person's last name is not BARRETT.

Hyannis, MA.

- 9. According to Massachusetts Registry of Motor Vehicles records, BARRETT began living at 43 Ridgewood Avenue in Hyannis in 2009.
- 10. According to W.W.'s receipt for the package, on May 20, 2015, he mailed a package to BARRETT at 43 Ridgewood Avenue, Hyannis, MA 02601, by USPS Priority Mail Express, package number EK164565158US. According to W.W., the package contained a \$5,000 check from his account at US Bank, no. xxxxxxx9318, payable to BARRETT.
- 11. According to postal records, on May 21, 2015 at 1:13 pm, someone accepted package number EK164565158US by signing "A. Barrett" and listing the delivery address as 43 Ridgewood Ave. in Hyannis.
- 12. According to Citizens Bank records for BARRETT's checking account no. xxxxxx8365, a \$5,000 check payable to BARRETT, from W.W.'s account no. xxxxxx9318 at US Bank, was deposited into BARRETT's account on May 22, 2015. The memo line on the check reads "FBI Agent." The check is endorsed with a signature that reads "A. Barrett."
- 13. According to postal records, BARRETT changed her address to 979 Falmouth Road, Apt. C18 in Hyannis, effective June 8, 2015.
- 14. According to W.W.'s receipt for the package, on June 8, 2015, he mailed a package to BARRETT at 979 Falmouth Road, Apt. C18, Hyannis, MA 02601, by USPS Priority Mail Express, package number EK164565189US. According to W.W., the package contained a \$4,000 check from his account at US Bank, no. xxxxxxx9318, payable to BARRETT.
- 15. According to Citizens Bank records for BARRETT's checking account no. xxxxxx8365, a \$4,000 check payable to BARRETT, from W.W.'s account no. xxxxxx9318 at

US Bank, was deposited into BARRETT's account on June 10, 2015. The check is endorsed with a signature that reads "A. Barrett."

16. W.W. did not receive any Mega Millions lottery winnings after he mailed checks to BARRETT. Nor did he get back the money he lost to "Mr. Washington" via Green Dot cards.

Conclusion

ASHLEY BARRETT, for the purpose of executing and attempting to execute a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, knowingly took and received from an authorized depository for mail, (a) on or about May 21, 2015, a check for \$5,000 from W.W. made payable to ASHLEY BARRETT (Count One); and (b) on or about June 10, 2015, a check for \$4,000 from W.W. made payable to ASHLEY BARRETT (Count Two), all in violation of 18 U.S.C. § 1341.

Sworn to under the pains and penalties of penjury.

DANIELLE SCHRAGE

Postal Inspector

Subscribed and sworn to before me on March 29, 2018.

al Dein

HOM. JUDITH G. DEIN

United States Magistrate Judge